

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

KEURIG GREEN MOUNTAIN SINGLE-SERVE
COFFEE ANTITRUST LITIGATION

14-md-2542 (VSB)(HBP)

SPECIAL MASTER REPORT

BARBARA S. JONES, SPECIAL MASTER

On April 12, 2019, I was appointed as Special Master to resolve the parties' disputes concerning documents withheld from production on the basis of privilege or as trial-preparation material, *i.e.* work product. Having conferred with the parties, I now submit this report to provide the Court with the procedure for my privilege review. The following procedures have been agreed upon by the parties.

1. On April 24, counsel for Keurig Green Mountain, Inc. ("Keurig") will provide Plaintiffs' counsel and me with a consolidated privilege log in excel format that will list the disputed documents.

2. Keurig will provide me with the disputed documents on a rolling basis. On April 24, counsel for Keurig will provide me with the first batch of documents for my review.

3. Keurig will provide documents in electronic format compatible with upload into a Concordance database. Keurig will provide the documents via a ShareFile electronic transfer link that my firm will provide.

4. With each submission of documents, Keurig will provide a legend of relevant persons and their roles and affiliations. Keurig also will provide this information to Plaintiffs.

5. With each submission of documents, Keurig may provide "context" documents to support its assertion of privilege. If a context document has been produced, Keurig will provide

the context document to Plaintiffs. If the context document has been withheld as privileged, Keurig will provide Plaintiffs with the Document ID number so that the Plaintiffs can locate the privileged context document on a privilege log.

6. With each submission of documents, Keurig may provide declarations regarding relevant third parties. Keurig will provide any such declarations to Plaintiffs.

7. If Keurig wishes to raise legal arguments in connection with its submissions of documents, it may do so in letter brief format, and Plaintiffs will have an opportunity to respond. I will rule on any legal issues in conjunction with my decisions on the underlying documents. The parties shall raise objections to any legal rulings and rulings on specific documents in a manner consistent with Judge Pitman's April 12, 2019 Order (ECF No. 569).

Dated: April 18, 2019
New York, New York

Respectfully submitted,



BARBARA S. JONES
Special Master